Water/Foam Sampling Plan - comments (R12)

Section 1.0: no comment

Section 2.0: no comment

Section 3.0: no comment

Section 4.1: Please add a bulleted item indicating that any additional area(s) or locations/units may be added as identified during post event evaluation by ITC and/or the oversight agencies.

Section 4.2: the referenced document was not provided (Cardno's *Field Documentation Standard Operating Procedures, 2016a).* Please provide for reference to the UC.

Section 4.3.1thru 4.3.4: no comment – this portion is specifically related to foam (EPA analytical method/sampling protocol)

Section 4.4.1: identify referenced areas within this section on a map/areal.

- Please define/identify 'transport pathway'.

- Outfall 002 – ***note that no discharge is to occur until cleared with the TCEQ.*** Sample/sampling will be specifically identified prior to any discharge. Indicate that any sampling conducted at 002 would be further coordinated with TCEQ prior to discharge.

- 003 – ***note that no discharge is to occur until cleared with the TCEQ.*** The permit to discharge from this outfall was issued for non-contact stormwater; however, at this time, the waters would be contact waters and subject to the same solid waste/hazardous management requirements as discussed for waters generated during the surface water recovery activities. This will remain until such time the source area of the stormwater has been fully remediated in accordance with the state and/or federal remediation criteria.

  Clarify the type of sampling and frequency. Post fire, the standard stormwater parameters will not be applicable, ITC will work with the TCEQ to identify the appropriate sampling parameters and frequency for the impacted stormwater outfall.

  Clarify that the sampling is of the actual discharge vs. the adjacent receiving surface water.

- Clarify the use of the term 'references' (background?) if so, it is important to ensure these locations are identified clearly and the source water being sampled appropriate for the use being proposed. If down-steam of the Tucker/Channel confluence, provide logic to the use as a reference sample.

Section 4.4.2: Review of the proposed locations upstream do not appear to be supported by field data/observations of potential impact zone. Please address the potential impact zone and limit the number of 'upstream' locations aside from a potential non-impacted area and increase the potential impacted area downstream.

The referenced document was not provided for use to confirm information referenced (Cardno's *Water Sampling SOP, 2015a).*

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Section 4.4.3/Section 6.0: Incorporate analyte list including parameter(s), collection container, preservation, hold time, analytical method by reference/number, turnaround time, etc. The parameter list should reflect the same scope as included in the EPA and TCEQ sampling.

These sampling plans can be provided as reference. However, the list includes: VOCs, SVOCs, O/G, etc. Address the protocol directive to be provided to the lab when there is phase separation of the sample. How this would be documented.

Identify the QA samples to be collected/used (e.g., trip blank, field, duplicate, etc.). If this is referenced in detail in the Cardno SOP, please indicate and provide the Cardno document so that we can see the specific information and provide any feedback (this goes for any of the referenced Cardno documents).

This section references that ITC/Cardno may make changes to these analysis. Indicate the conditions that would influence a sample parameter change and note what would be changing (e.g., collection method, parameter to be analyzed, analytical method). Indicate how this would be shared (and timing), as well as how documented. State and ensure that any lab used has the parameters to be analyzed being conducted with a NELAC verified method.

Section 5.0: Please further elaborate/explain:

- The rational for moving the floating product to collect a sample. There is no mention of sampling this phase, this too should be sampled.
- Depth of sample
- Sampling protocol for phase separated media

Provide the referenced the Cardno document, *Sample Custody Procedures SOP, (2016c).*
Section 7.0: the DI used for field blanks needs to be free of VOCs – verify this is the DI water to be provided for the trip/field blanks.

ID the approach to determine the single field blank identified; rational for not having with each location or at minimum each contamination zone (e.g., if heavy ship traffic while sampling)